



Securus Wealth Management, LLC Form ADV, Part 2A Brochure

This Brochure provides information about the qualifications and business practices of Securus Wealth Management, LLC. If you have any questions about the contents of this Brochure, please contact us at 763-231-7880 or info@securuswealth.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Securus Wealth Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Securus Wealth Management, LLC is 138919

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Registration does not imply a certain level of skill or training.

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MATERIAL CHANGES

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes Since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisors to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization. As such we have revised our ADV Part 2 form to reflect this new rule.

The last annual update of ADV Part 2 was on March 29, 2011

Since our last update, we have added TD Ameritrade as another qualified custodian, updated our fee disclosures and added a section regarding our Business Continuity Plan.

Full Brochure Available

Securus Wealth Management will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting us at 763-231-7880 or info@securuswealth.com.

Additional information about Securus Wealth Management is also available via the SEC’s web site www.advisorinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Securus Wealth Management who are registered, or are required to be registered, as investment advisor representatives of Securus Wealth Management.

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ADVISORY BUSINESS

Description of Advisory Firm

Securus Wealth Management, LLC (“SWM”, “We”, “Our”, or “Us”) is a privately owned Limited Liability Corporation headquartered in Plymouth, MN. SWM is a federally registered investment advisor (RIA) with the Securities and Exchange Commission (SEC).

SWM was started in 1994 by James Goodland and was previously known as The Financial Resource Group. For the purpose of branding, in December 2005 we changed our name to Securus Wealth Management, LLC and registered as an investment advisor with the state of Minnesota. In January 2006, SWM registered as an investment advisor with the SEC. Currently, James Goodland is the only equity owner.

Assets under the direct management of Securus Wealth Management, LLC, are held in the client’s name by independent custodians, including Fidelity Investments, Charles Schwab, TD Ameritrade, Pershing, National Financial Services or others.

We may recommend other professionals (e.g., lawyers, accountants, insurance agents, real estate agents, etc.) at the request of the client. Other professionals are engaged directly by the client on an as-needed basis even when recommended by the SWM. Conflicts of interest will be disclosed to the client and managed in the best interest of the client.

Advisory Services Offered

Individuals associated with SWM provide its investment advisory services. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on behalf of SWM. Such individuals are known as Investment Adviser Representatives (“IARs” or “advisor representatives”). SWM offers the following services to advisory clients:

Asset Management

SWM provides continuous advice to clients regarding investment of client funds based on the individual needs of the client. Through personal discussions, in which goals and objectives based on a client’s particular circumstances are established, SWM develops a client’s personal investment strategy and creates and manages a portfolio based on that strategy.

SWM creates a portfolio consisting of one or more of the following: individual equities, bonds, exchange traded funds (ETFs), closed-end funds, and no-load mutual funds. Clients have the opportunity to place reasonable restrictions on the types of investments made on the client’s behalf.

When appropriate to the needs of the client, SWM may recommend the use of margin transactions or option writing. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the client’s stated tolerance for risk.

Third Party Money Managers

SWM may direct clients to third party money managers. This relationship will be disclosed in each contract between SWM and each third party advisor. Before selecting other advisors for clients, SWM will always ensure those other advisors are properly licensed or registered as investment an advisor.

General Investment Advice

SWM offers general investment advice services for clients who desire advice for investment needs that are not deemed as investment advisory clients.

General Investment Advice services are generally offered on an hourly basis, and may include advice on portfolio construction, asset allocation, income-planning, portfolio review/analysis, analysis/management of specific securities, or other circumstances.

Financial Planning

SWM may develop a comprehensive financial plan integrating investment strategies, cash-flow needs, budgeting issues, debt management, tax-related issues, insurance needs, risk management needs and savings strategies.

Depending on the complexity, financial planning fees can be charged as a flat fee or on an hourly basis. Fees are negotiable and may be separate from SWM's INVESTMENT ADVISORY fees. For more information regarding these fees, please see **Item 5 – Fees and Compensation**

Tailored Relationships

At SWM, advisory services are tailored to the individual needs our clients. Client goals and objectives are clarified in meetings and via correspondence, and are used to determine the course of action for each individual client. The goals and objectives for each client are documented in our client relationship management system and in client files, either in hard copy or in electronic files.

Clients may impose restrictions on investing in certain securities or types of securities. This must be done in writing and be signed by the client. Agreements may not be assigned without client consent.

Assets Under Management

As of 12/31/2011, SWM managed approximately \$135,186,731 in assets. Approximately \$126,289,611 is managed on a discretionary basis, and \$8,897,120 is managed on a non-discretionary basis. SWM's IARs also oversee approximately \$142,345,750 outside of the registered investment advisor through the IAR's registered representative status with Cambridge Investment Research, Inc., a federally registered broker/dealer member SIPC.

Business Continuity Plan

SWM has established a Business Continuity Plan (BCP). The BCP describes how SWM responds to significant business disruptions and provide investors with alternative contact information in the event of a significant business disruption. The BCP Summary available upon written request.

FEES AND COMPENSATION

Fee Schedule

Securus Wealth Management bases its fees on a percentage of assets under management, hourly charges, fixed fees, and a retainer that is not calculated on an assets under management basis or on an hourly estimate. All fees are negotiable.

Investment advisory fees are generally billed according to the schedules below:

For households and total portfolios with assets under management greater than \$1,000,000.00

Assets Under Management	Annual Fee
The first \$1,000,000	1.25%
\$1,000,001 - \$2,000,000	1.00%
\$2,000,001 - \$5,000,000	0.75%
\$5,000,001 - \$10,000,000	0.50%
\$10,000,001+	0.25%
Account Set-up fee (one-time only):	\$1,500

For households and total portfolios with assets under management of less than \$1,000,000.00

Assets Under Management	Annual Fee
The first \$250,000	1.75%
\$250,001 to \$500,000	1.50%
\$500,001 to \$1,000,000	1.25%
Account Set-up fee, Investment Policy	\$500 per account, maximum
Statement (IPS) design (one-time only):	of \$1,500

Securus IAR's can change or modify this fee agreement based on individual circumstances that may require a different fee schedule. Any alterations to the above general fee schedule are required to be in writing between the client and SWM prior to any fees being charged and must be approved in advance by the Securus Chief Compliance Officer

Calculation and Payment

Advisory fees are normally charged quarterly in advance. The number of days in the quarter is divided by 365. This figure is multiplied by the annual fee. This fee factor is then multiplied by the account balance as of the last business day of each quarter.

Additional assets deposited into a client's account after it is opened or after the quarterly billing date, may be charged a pro rata fee based upon the number of days remaining in the current calendar quarter. No fee adjustments will be made for partial withdrawals. If an account falls below the minimum account size requirement, SWM reserves the right to terminate advisory services

Advisory fees will be withdrawn directly from the client's account held by an independent custodian. The custodian withdraws the advisor fees from the client's account based on our instruction. At least quarterly, the custodian will send an account statement directly to the client

indicating the amounts disbursed from the account including the amount of advisory fees paid to SWM.

For those clients who choose not to have advisory fees withdrawn directly from their accounts, payment of advisory fees is due upon receipt of SWM's billing invoice. The invoice will include the account value, fee calculation, and amount due.

All fees paid to Securus Wealth Management, LLC for financial planning and advisory services are completely separate and distinct from the transaction fees, custodial fees, transfer fees and expenses charged by the custodian or Mutual Fund Company. These fees and expenses are deducted directly from the client's account and go directly to the custodian or Fund Company. SWM does not receive any portion of these fees.

Financial Planning

Fees generally start at \$750 for financial plans. Comprehensive plans average \$1,500 but may go as high as \$10,000 depending on the scope and complexity of the plan. Hourly charges for financial planning range from \$150 - \$550 per hour, depending on the independent advisor representative ("IAR") performing the work. Actual costs are agreed upon in advance and have a 50% minimum paid upon entering the agreement, with the remainder to be paid upon completion of the plan. Financial planning fees are negotiable and may be separate from SWM's investment advisory fees. Typically, prepayment of fees in excess of \$1200 shall not be required more than six months in advance of the work agreed upon between SWM and the client.

Concierge Services and Special Projects

Special Projects involving Principal Jim Goodland are billed at the rate of \$550/hour. Special projects involving a senior planner are billed at \$150 - \$300/hour. Special Projects involving an associate planner are billed at \$150/hour. Estimates are provided and a deposit requested. Since the nature of the work often involves variables or circumstances unknown at the start of the engagement, estimates are not guaranteed.

Other Compensation

SWM may be compensated via a fee share from third party money managers. The fees shared will not exceed any limit imposed by any regulatory agency.

Conflicts of Interest

The receipt of commission payments presents a conflict of interest and could give us an incentive to recommend investment products based on the compensation we receive, rather than on the client's needs.

SWM may receive compensation for the sale of securities or other investment products, including asset based sales charges or services fees from the sale of mutual funds to its clients. We may recommend these securities as part of a client's overall portfolio strategy. The commissions we receive are separate from and in addition to the fees paid to us for our investment advisory services.

SWM may direct clients to third party money managers. SWM will be compensated via a fee share from the advisors to which it directs those clients. This creates a conflict of interest in that SWM has an incentive to direct clients to the third party money managers that provide SWM with a larger fee split. SWM will always act in the best interests of the client, including when determining which third party manager to recommend to clients.

Securities that generate commissions are excluded from the asset values used for calculating fees for investment advisory services. However, advisory fees that are charged are not reduced to offset the commissions or markups on securities or investment products recommended to clients

Anytime we would receive a commission from the sale of a recommended investment product, we will disclose that conflict to our clients. Our disclosure may be in conversations with the client or may be in writing. Clients are free to choose whether they act on our recommendations to purchase investment products or not. Clients always have the option to purchase SWM recommended products through other brokers or agents that are not affiliated with SWM.

Termination

SWM reserves the right to stop work on any account that is more than 60 days overdue. In addition, SWM reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate to providing proper financial advice, per the judgment of SWM.

Either party may terminate the agreement upon thirty (30) days written notice to the other party.

If SWM terminates the agreement, the current management fee will be pro-rated to the notice date and refunded to client.

If the client terminates the agreement or transfers all assets to another custodian or removes SWM as the designated investment advisor with the current custodian, the advisory agreement in force will be deemed terminated without proper notice and no refund of fees will be required. SWM may refund a portion of the current management fee at our discretion.

If either party terminates the investment advisory agreement, SWM will not liquidate any securities in the account unless authorized in writing by the client. In the event of client's death or disability, we will continue management of the account until an authorized party notifies us of client's death or disability and provides alternative instructions. Upon termination, we instruct the custodian to debit all outstanding unpaid management fees owed from any client that pays separately (via invoice).

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

SWM does not charge performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

TYPES OF CLIENTS

Securus Wealth Management, LLC provides investment advisory services to individuals, families, trusts, estates, charitable organizations, including foundations and endowments, corporations and other business entities.

Account Minimums

SWM normally requires a new account minimum of \$500,000 for investment advisory services. Related household, family and business accounts may be aggregated to meet the minimum, subject to approval by SWM. Occasionally, the minimum may be waived for unique situations or if a client is approaching retirement and has fewer investable assets, but anticipates moving additional assets under management at retirement. Clients are advised that smaller accounts are more difficult to diversify and rebalance and may not experience the same performance as larger accounts.

Significant funds withdrawal may result in a request for additional fund deposits to continue with the management of accounts.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis

Security analysis methods at SWM include technical analysis, fundamental analysis, asset class and sector analysis, momentum and supply/demand indicators and other analysis. The main resources for information comes from our investment committees independent research, research reports prepared by outside firms and analysts, Morningstar reports, S&P reports, financial publications and filings with the SEC. Employees and IARs frequently attend on and off-site visits with fund and portfolio managers, related conference calls, webinars and industry conferences.

Investment Strategies

The primary investment strategies SWM employs is tactical asset allocation which is a less passive way of tactically adjusting portfolios based on current research and analysis. Tactical asset allocation can require the portfolio to be rebalanced as necessary to incorporate SWM's best current asset class selections. Portfolios generally consist of exchange traded funds (ETFs), actively managed mutual funds and separate accounts where opportunities exist for the underlying fund manager to make a difference, exchange traded funds and individual stocks and bonds. Portfolios are generally globally diversified to help control the risks associated with traditional markets. We also may recommend independent third party managers who display certain expertise and disciplines when appropriate for the client.

The investment recommendations for a specific client is based on each client's independent needs which include objectives, risk tolerance, income needs, tax situation and other material information gathered from the client during consultations. The client may change these objectives at any time. While SWM does employ several model portfolios for analysis, each client's portfolio is constructed independently and may include a combination of our internal models or a completely independent portfolio design

Risk of Loss Statement

Prior to entering into an agreement with SWM, a client should carefully consider:

1. That investing in securities involves risk of loss which clients should be prepared to bear;
2. That securities markets experience varying degrees of volatility; and
3. That over time the client's assets may fluctuate and at anytime be worth more or less than the amount invested.

Our investment approach always keeps the risk of loss in mind and while we strive to minimize risks appropriately there are no guarantees against loss of principal. As with all investments, clients may face one or more of the following risks: Loss of Principal Risk, Interest-rate Risk, Market Risk, Inflation Risk, Currency risk, Business Risk, Liquidity Risk and Financial Risk.

DISCIPLINARY INFORMATION

We are required to disclose whether there are legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. SWM does not have any legal or disciplinary information to disclose.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Registration as a Broker-Dealer or Broker-Dealer Representative

SWM and its representatives are Registered Representatives of Cambridge Investment Research, Inc. ("Cambridge"), a non-affiliated securities Broker-Dealer and member of FINRA. As such, they execute securities transactions for clients on a commissioned basis. The time they spend on sales related activities is approximately 20% with 80% the time spent on SWM's activities.

Licensed Insurance Agents

SWM's IARs and associated persons may also be agents of life insurance companies for the sale of insurance products or as independent life insurance brokers, enabled to sell any number of products to their clients. In either case, they would be licensed through their selling company as well as their respective state insurance department(s).

Other Affiliations

In addition, some of SWM's IARs and associated persons have entered into an Equity Participation Plan with Cambridge. Under this arrangement, SWM's IARs have the ability to earn a percentage of Cambridge's overall profit ratio. SWM's IARs are not owners or officers of Cambridge. However, they are eligible to participate in the Equity Participation Plan due to their affiliation as Registered Representatives of Cambridge. This arrangement between SWM's IARs and Cambridge is a potential conflict of interest between SWM and its clients in that it may inhibit SWM's independent judgment concerning the best execution services offered by Cambridge.

CODE OF ETHICS PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

SWM believes that we owe clients the highest level of trust and fair dealing. Further, as part of our fiduciary duty, we place the interests of our clients ahead of the interests of the firm and our personnel and associated persons. SWM's personnel and associate persons are required to conduct themselves with integrity at all times. CFP® designees are also held to a Code of Ethics as outlined by the CFP® Board of Standards. SWM firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions and Personal Trading

SWM and its associated persons may trade securities for their own account. These transactions may be the same or similar to transactions they recommend and/or effect for any advisory client. Employees and other related parties may not trade their own securities ahead of client trades.

The Chief Compliance Officer of SWM is James Goodland. Jim reviews all supervised individuals' trades each quarter. His personal trades are reviewed by Chief Operating Officer, Kristen Mueller. The personal trading reviews ensure that the personal trading of employees and other related parties were not based on inside information and that clients of the firm receive preferential treatment.

SWM is and will continue to be in total compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988 and the applicable rules of state and federal securities laws, including the prohibition of insider trading. SWM maintains the required personal securities transaction records for all employees and other related parties.

CROSS TRANSACTIONS

Agency Cross Transactions

Securus Wealth Management's policy and practice is to NOT engage in any agency cross transactions.

An agency cross transaction is defined as a transaction where a person acts as an investment advisor in relation to a transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, acts as broker for both the advisory client and for another person on the other side of the transaction (SEC Rule 206(3)-2(b)). Agency cross transactions typically may arise where an advisor is dually registered as a broker-dealer or has an affiliated broker-dealer.

Agency cross transactions are permitted for advisors only if certain conditions are met under Advisors Act rules including written consent, client disclosures regarding trade information and annual disclosures, among other things.

The Chief Compliance Officer has the overall responsibility implementing and monitoring SWM's policy of not engaging in any agency cross transactions with any of our advisory clients

BROKERAGE PRACTICES

Factors Used to Select Custodians and/or Broker-Dealers

SWM does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. SWM recommends custodians based on the proven integrity and financial responsibility of the firm, best execution of orders at reasonable fee rates, and the quality of client service.

Research and Other Soft Dollar Benefits

SWM recommends discount brokerage firms and broker-dealers such as Fidelity and Charles Schwab. SWM does not receive fees or commissions from any of these arrangements, although SWM may benefit from electronic delivery of client information, electronic trading platforms and other services provided by custodians for the benefit of clients. SWM and our clients may also benefit from other services provided by custodians, such as research, continuing education, client appreciation and educational events, conferences on practice management, regulatory compliance, information technology, and business success. They may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to SWM. These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions. Our custodians may also provide other benefits such as

SWM reviews the execution of trades at each custodian annually. Trading fees charged by the custodians are also reviewed on an annual basis. SWM does not receive any portion of the trading fees.

Aggregation and Allocation of Transactions

In some cases, SWM will recommend the purchase or sale of the same security for multiple clients at the same time. In those cases, SWM may combine purchase and sale orders for all clients with the same order. SWM will generally allocate the proceeds arising out of those transactions (and the related transactions expenses) on an average price basis among the various participants in the transactions. SWM believes that by combining orders in this way it will be advantageous to all participants. However, the average price could be less advantageous to a particular client than if that client had been the only account effecting the transaction or had completed its transaction before the other participants.

SWM may also place orders for the same security for different clients at different times and in different relative amounts due to, among other things, differences in investment objectives, cash availability, size of order, and practicability of participating in “block” transactions. The level of participation by different clients in the same security may also be dependent upon other factors relating to the suitability of the security for the particular client. There are circumstances when some of a client’s transactions in the security may not be aggregated with other clients. SWM has adopted policies and procedures intended to ensure that our trading allocations are fair to all of our clients.

REVIEW OF ACCOUNTS

Managed Account Reviews

We manage portfolios on a continuous basis and generally review all positions in client accounts at least monthly. We offer account reviews to clients no less than annually. Clients may choose to receive reviews in person, by telephone, or in writing. Reviews are conducted individually based on each client's relationship with SWM and its IARs.

In addition, we may conduct a special review of an account based one or more of the following:

1. A change in the client's investment objectives, guidelines and/or financial situation (such as retirement, termination of employment, physical move, or inheritance);
2. Changes in diversification;
3. Tax considerations;
4. Material market, economic, or political events;
5. Material cash deposits or withdrawals; and
6. Purchase or sale of a security in the account.

All financial planning accounts are reviewed upon financial plan creation and plan delivery. There is only one level of review and that is the total review conducted to create the financial plan.

Account Reporting

Each client receives a written statement from the independent custodian that includes an accounting of all holdings and transactions in the account for the reporting period. SWM may also provide additional reporting as agreed upon by SWM and the client on a case-by-case basis.

Financial Planning Clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

CLIENT REFERRALS AND OTHER COMPENSATION

Client Referrals to Other Professionals

SWM only refers clients to professionals we believe are competent and qualified in their field. However, it is ultimately the client's responsibility to review the provider. We will generally provide the client with the professional's contact information, and it is solely the client's decision whether to engage a recommended firm. Clients are under no obligation to purchase any products or services through these professionals, and we have no control over the services they provide.

Clients that chose to engage these professionals will sign a separate agreement with the other firm. Fees charged by the other firm are separate from and in addition to fees charged by SWM. If the client desires, SWM will work with these professionals or the client's other advisers (such as an accountant or attorney) to help ensure that the provider understands the client's portfolio and to coordinate services for the client. SWM will never share information with an unaffiliated professional unless first authorized by the client.

If the client desires, SWM will work with these professionals or the client's other advisers (such as an accountant or attorney) to help ensure that the provider understands the client's portfolio and

to coordinate services for the client. SWM will never share information with an unaffiliated professional unless first authorized by the client.

Incoming Referrals

SWM has agreements in place with various solicitors. If a solicitor introduces a client to SWM, we pay that solicitor a referral fee in accordance with the requirements of Rule 206(4) -3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. The fee paid to these solicitors is deducted from the advisory fee received by SWM from the client, and therefore, is part of and not addition to the advisory fee paid by the client. The client will not pay additional fees because of this referral arrangement. Any affiliated solicitor of SWM will disclose the nature of the relationship to prospective clients at the time of the solicitation and will provide all prospective clients with a copy of this brochure.

Conflict of Interest

Referral fees are contingent upon the client entering into an advisory agreement with SWM. Therefore, a solicitor has a financial incentive to recommend SWM to clients for advisory services. This creates a conflict of interest; however, the client is not obligated to retain SWM for advisory services.

CUSTODY

Custody, as it pertains to an investment adviser, has been defined by the SEC as having access or control over client funds and/or securities, but does **not** include the ability to execute transactions in client accounts. Custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody for purposes of the Investment Advisers Act of 1940 and must ensure proper procedures are implemented.

Based on the SEC's definition, SWM is deemed to NOT have custody of SMS's advisory accounts.

Fee Debiting

SWM has limited custody of some of our clients' funds or securities when the clients authorize us to deduct our management fees directly from the client's account. A qualified custodian (i.e. Charles Schwab or Fidelity) holds clients' accounts.

Account Statements

Clients will receive statements directly from the qualified custodian at least quarterly. The statements will reflect the client's funds and securities held with the qualified custodian as well as any transactions that occurred in the account, including the deduction of our fee.

Clients should carefully review the account statements you receive from your qualified custodian. When clients receive statements from SWM as well as from the qualified custodian, clients should compare these two reports carefully. Clients with any questions about your statements should

contact us at the address or phone number on the cover of this brochure. Clients who do not receive statements from the qualified custodian at least quarterly should also notify us.

INVESTMENT DISCRETION

Discretionary Authority for Trading

SWM accepts discretionary authority to manage securities accounts on behalf of clients. SWM has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, if discretionary authority or a limited power of attorney has not been given, SWM consults with the client prior to each trade to obtain concurrence. Discretionary trading authority facilitates placing trades in clients' accounts on their behalf so that we may promptly implement the investment policy that they have approved. In most cases, clients are provided with an opportunity for review and discussion prior to implementation of recommendations.

Third party investment managers have full discretion over trades and do not consult with SWM or with clients before placing trades.

VOTING CLIENT SECURITIES

Proxy Voting

SWM does not accept or have the authority to vote client securities. SWM will not be deemed have proxy voting authority solely as a result of providing advice or information about a particular proxy vote to a client. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent. It is the Clients' responsibility to vote all proxies for securities held in accounts being managed by SWM.

Although we do not vote proxies, we permit our IARs to answer questions you may have regarding proxy voting materials in an effort to assist you in determining how to vote the proxy. However, the final decision of how to vote the proxy rests solely with you, the client. It is the decision of each SWM IAR to consult with his/her clients regarding proxy decisions; therefore not all SWM IARs will consult with their clients on proxy matters.

ERISA

Because we do not vote proxies, clients must ensure the applicable ERISA-plan documents reserve to the plan trustees the right to vote proxies and that the client shall maintain exclusive responsibility for determining all proxy voting decisions.

Class Actions

SWM does not instruct or give advice to clients on whether or not to participate as a member of class action lawsuits and will not automatically file claims on the client's behalf. However, if a client notifies us that they wish to participate in a class action, we will provide the client with any transaction information pertaining to the client's account needed for the client to file a proof of claim in a class action.

FINANCIAL INFORMATION

This item is not applicable to our Disclosure Brochure. SWM does not allow, require or solicit the prepayment of more than \$1,200 in fees per client, six months or more in advance, and does not foresee any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Neither SWM nor our affiliated companies are subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, we have not been the subject of a bankruptcy petition at any time

OTHER INFORMATION

Privacy Policy

How We Use and Protect Personal Information

To Securus Wealth Management, LLC, ("SWM") protecting your privacy is very important. We value your trust and we want you to understand what information we collect, how we protect it, and how we use it. We treat personal information - nonpublic information that identifies you - with respect and in accordance with this privacy policy.

Information We May Collect

We may obtain information, much of which comes directly from you, to provide you with products and services you have requested and as we deem appropriate, to determine your eligibility for products or services. We may collect identification and contact information, as well as transaction and investment experience information from applications, transactions with others and us, and from outside companies.

Examples of the Sources and Types of Information We May Collect Include:

- Information about the products and services you purchase through us, including copies or applications, registration forms, or other forms, containing your name, address, telephone number, Social Security number, email address, investment objectives, income, assets, employment information, and accounts with others;
- Information regarding your brokerage and/or investment advisory transaction history with us, our service providers, such as clearing firms, or other companies; and information that other companies who assist us in marketing our own products and services or products we offer jointly with other financial institutions may have, such as your name, address, and telephone number.
- Information under the USA Patriot Act enacted by the United States Treasury Department and Congress to combat terrorism.

(Investor notification is available upon request.)

Information We May Disclose and to Whom We May Disclose Information

SWM does not disclose your personal information to companies or organizations not affiliated with us that would use the information we have provided them to contact you about their own products and services. We may disclose all the personal information we collect, as described above, to companies, such as insurance companies and brokers, banks, broker/dealers and investment advisers that provides services to you on our behalf, in the following types of situations:

- Providing administrative, customer assistance, clearing, operational, or other services;
- Preparing, printing and delivering investment advisory performance reports, confirmation statements, and other documents;
- Executing securities transactions;
- Maintaining or developing software for us; and a financial institution (such as banks, investment advisers, or securities firms) with which we have joint marketing arrangements to jointly endorse

or offer financial products or services. SWM will not sell your personal and confidential information to unaffiliated third parties.

Disclosures Permitted by Law

We may also disclose all the information we collect as permitted or required by law. For example, we may disclose information to law enforcement agencies or insurance and securities regulatory agencies.

Instructions on How to Notify Us

For any questions regarding this policy, please contact your Registered Representative directly or call the SWM Compliance Department at 763-231-7886.